

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MINNESOTA LIFE INS. CO.,)	
)	
Plaintiff,)	C.A. No. 05-638
)	
v.)	
)	
LAURA REARDON GREEN, SHIRLEY)	
MANSFIELD and NORMA PATRICIA)	
REARDON,)	
)	
Defendants.)	

**ANSWER AND CROSS-CLAIM IN INTERPLEADER
OF DEFENDANT LAURA REARDON GREEN**

Defendant Laura Reardon Green ("Green") hereby answers the complaint for interpleader of plaintiff Minnesota Life Insurance Company and states the following cross-claim to the interpled funds:

ANSWER

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted only that Mansfield is the ex-wife of the decedent. As for the remaining allegations of this paragraph, Green lacks sufficient knowledge to admit or deny the truth of the averments so in effect they are denied.
5. Admitted only that Reardon was the wife of decedent at the time of his death. As for the remaining allegations of this paragraph, Green lacks sufficient knowledge to admit or deny the truth of the averments so in effect they are denied.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted.

10. Admitted.

11. Admitted.

12. As for herself, admitted. As for the other defendants, Green lacks sufficient knowledge to admit or deny the truth of the averment so in effect it is denied.

13. As for herself, admitted that Green has made a claim to the proceeds, although Green would not use the word "threatened" to describe her claim. As for the other defendants, Green lacks sufficient knowledge to admit or deny the truth of the averment so in effect it is denied.

14. Admitted.

15. No response required, although Green does not object to the relief sought by the plaintiff in this paragraph.

CROSS-CLAIM

16. Green is entitled to the entire proceeds of the subject policy in that the Virginia law cited in the complaint forecloses Mansfield's claim and that Green is named as the contingent beneficiary under the policy.

WHEREFORE defendant and cross-claimant Laura Reardon Green respectfully requests that the Court enter orders:

- a) granting the relief sought in the complaint;
- b) entering judgment in Green's favor and against Mansfield and Reardon and directing the payment of the full amount of all sums deposited with the Court to Green; and
- c) granting such other relief as the Court deems just.

FERRY, JOSEPH & PEARCE, P.A.

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Dated: September 7, 2005